

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**SECOND DECLARATION OF KEVIN GANNON IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT OF VALIDITY  
BASED UPON *INTER PARTES* REVIEW ESTOPPEL  
UNDER 35 U.S.C. § 315(e)(2)**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular"), in this action. I submit this declaration in support of Singular's motion for partial summary judgment of validity based upon *inter partes* review estoppel under 35 U.S.C. § 315(e)(2).

2. Exhibits A-Y were attached to my original declaration filed in support of Singular's motion on November 3, 2022. *See* Dkt. No. 377-3.

3. Attached hereto as Exhibit Z is a true and correct copy of excerpts from a thesis by Pavle Belanović titled "Library of Parameterized Hardware Modules for Floating-Point Arithmetic with An Example Application."

Executed at Boston, Massachusetts on December 16, 2022.

/s/ Kevin Gannon